

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
LAREDO DIVISION

United States Courts  
Southern District of Texas  
FILED

JUN 20 2018 2A

David J. Bradley, Clerk  
Laredo Division

UNITED STATES OF AMERICA

v.

VENUS AMEYALLI ROJAS-PEREZ

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CRIMINAL NO. 5:18-cr-00359

**FACTUAL STATEMENT IN SUPPORT OF PLEA AGREEMENT**

The United States of America, by and through Ryan K. Patrick, United States Attorney for the Southern District of Texas and Alfredo De La Rosa, Assistant United States Attorney, and the defendant, VENUS AMEYALLI ROJAS-PEREZ and the defendant's counsel, hereby stipulate as follows:

I.

If this case proceeded to trial, the United States of America would prove each element of the offense beyond a reasonable doubt. The following facts, among others, would be offered to establish the Defendant's guilt:

II.

On April 23, 2018, Laredo Police Department (LPD) received information that a house on Westchester Driver in Laredo, Texas was being used as a stash house for undocumented aliens (UDAs). LPD conducted surveillance and saw three separate vehicles approach the house, enter the garage, the garage door would be completely closed and then, shortly thereafter, the door would open and the vehicles would leave. On April 24, LPD, Homeland Security Investigations (HSI), and Border Patrol Agents (BPAs) attempted to conduct a welfare check on the house at about 5pm, but no one answered the door. Several hours later, three individuals were seen exiting the backdoor

and attempting to flee through a hole in the privacy fence. The three individuals, one of who was later identified as the defendant VENUS AMEYALLI ROJAS-PEREZ, retreated back to the house after seeing BPAs. The next morning, at about 7am, an undocumented alien (UDA) signaled a BPA to come to a front window. The UDA stated that he was a UDA from Guatemala and there were 20-30 UDAs in the house and they wanted to leave but could not because all the doors were locked. HSI agents then obtained a search warrant and entered the house around noon. A total of 25 people were found. All were determined to be undocumented aliens with no status allowing them to enter, travel through, or remain in the United States.

The defendant was interviewed and initially claimed that she was just one of the UDAs, but eventually admitted that she was paid \$500 a week to take care of the UDAs at the stash house and that she had already been paid about \$1,100. *JVR*

Material witnesses Luis Adolfo Tec-Yaqi, Yulissa Estela Cristobal-Sanchez, and Bryon Lopez-Aju all admitted to being UDAs with no status allowing them to enter, travel through, or remain in the United States. All stated they paid various amounts of money to be smuggled into the United States. All described being smuggled into the United States before eventually being taken to the stash house where they were arrested by HSI and BP. Cristobal-Sanchez identified the defendant as being the stash house operator.

Defendant, **VENUS AMEYALLI ROJAS-PEREZ**, hereby confesses and judicially admits that on **April 25, 2018**, he/she knowingly **conceal, harbor or shield undocumented aliens for financial gain**, in violation of Title **8**, United States Code, Section **1324**.

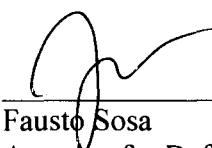
*Venus Rojas*  
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VENUS AMEYALLI ROJAS-PEREZ  
Defendant

APPROVED:

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